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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KING ISAAC UMOREN,

Defendant.

2:19-CR-064-APG-NJK

**United States of America's Motion to  
Approve Sale Price and Sale Terms for  
Real Property Located at 991 Feather  
Haven Court, Henderson, Nevada 89011**

The United States moves this Court to approve a sale of 991 Feather Haven Court, Henderson, Nevada 89011 (property)<sup>1</sup> for \$310,000.

<sup>1</sup> MORE PARTICULARLY DESCRIBED AS:  
PARCEL I:

LOT EIGHT (8) IN BLOCK TWO (2) OF AMENDED PLAT OF A PORTION OF TWO CROWS UNITS 1, 2, 3 AND 4, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 85 OF PLATS, PAGE 23, AND AMENDED BY CERTIFICATE OF AMENDMENT RECORDED DECEMBER 1, 1998 IN BOOK 981201 OF OFFICIAL RECORDS AS DOCUMENT NO. 01274, AND THEREAFTER AMENDED BY CERTIFICATE OF AMENDMENT RECORDED APRIL 19, 1999 IN BOOK 990419 AS DOCUMENT NO. 00496, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA.

EXCEPTING THEREFROM AND GRANTING HERETO AN EASEMENT FOR INGRESS AND EGRESS OVER THOSE PORTIONS OF THE LOTS WITHIN SAID SUBDIVISION DELINEATED AS "PRIVATE DRIVE AND UTILITY EASEMENT" ON THE PLAT OF SAID SUBDIVISION.

PARCEL II:

A NON-EXCLUSIVE RIGHT AND EASEMENT OF INGRESS TO, EGRESS FROM AND ENJOYMENT OF THE COMMON ELEMENTS AS SHOWN IN THAT CERTAIN "DECLARATION OF PROTECTIVE COVENANTS, CONDITIONS AND RESTRICTIONS AND GRANT OF RESERVATION OF EASEMENTS FOR EAST HAWLEYWOOD OWNERS ASSOCIATION" RECORDED AUGUST 4, 1998 IN BOOK 980804 AS DOCUMENT NO. 01812, OF OFFICIAL RECORDS, CLARK

1 The reasons for this request are (1) to authorize Doug Sawyer to sell the property for  
 2 \$310,000 under the Court-ordered interlocutory sale and Final Order of Forfeiture and (2) to  
 3 stop the continued increase of (a) the delinquent Clark County real property taxes, interest,  
 4 and penalties and (b) HOA fees, interest, and penalties.

5 This Motion is made and is based on the papers and pleadings on file herein and the  
 6 attached Memorandum of Points and Authorities.

### 7 **Motion and Memorandum of Points and Authorities**

8 This Court authorized the Interlocutory Sale of the property and forfeited the  
 9 property in the Final Order of Forfeiture.<sup>2</sup> Mr. Sawyer listed the price for \$350,000. D&M  
 10 Trust offered \$310,000 to purchase the property. If this Court does not approve the sale, the  
 11 Trust will receive its earnest money deposit.

12 If this Court approves the sale price and sale terms, the proceeds will be accounted  
 13 for and distributed in the following order: (1) unpaid real estate taxes; (2) unpaid HOA fees;  
 14 (3) the broker commission at a rate of 6% of the purchase price; (4) reimbursement of Mr.  
 15 Sawyer for his resale expenditures related to effecting the sale; and (5) the remaining  
 16 proceeds to the government to be held in an interest-bearing account by the United States  
 17 Marshals Service, which will constitute the amount to be retained by the Court as a  
 18 substitute res under Supp. R. G(7)(b)(iii) and (iv).

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 27 COUNTY, NEVADA, TOGETHER WITH ANY AND ALL IMPROVEMENTS AND  
 APPURTENANCES THEREON. APN: 160-33-616-005.

28 <sup>2</sup> Order granting 46 Motion for an Interlocutory Order of Sale of 991 Feather Haven Court,  
 ECF No. 66; Final Order of Forfeiture, ECF No. 183.

1 The government has determined that (1) neither the buyer nor any individual who  
2 will be on the title after the completion of the sale is a felon; and (2) this sale represents an  
3 arms-length transaction.

4 Dated: December 22, 2022.

JASON M. FRIERSON  
United States Attorney

6  
7 /s/ Misty L. Dante  
MISTY L. DANTE  
Assistant United States Attorney

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10 IT IS SO ORDERED:

11   
12 ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE

13 DATED: January 6, 2023  
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